



NMED Air Quality Bureau

Small Business Environmental Assistance Program

Overview of Some Recent Area Source NESHAPs (National Emission Standards for Hazardous Air Pollutants)

40 CFR 63

Subpart BBBBB (6B) - Gasoline Distribution Facilities

Subpart CCCCC (6C) - Gasoline Dispensing Facilities (GDFs)

What are NESHAP Area Sources?

Sources of hazardous air pollutants (HAPs) may individually, or in the aggregate, present significant risks to public health in urban areas.

Area Sources of HAP emissions are less than 10 tons per year (TPY) of any one, and less than 25 TPY of all combined.

Subparts 6B and 6C target the air emissions from the HAP Benzene contained in gasoline.

Area Source NESHAPs 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants)

40 CFR 63 Subpart BBBBBB (6B)

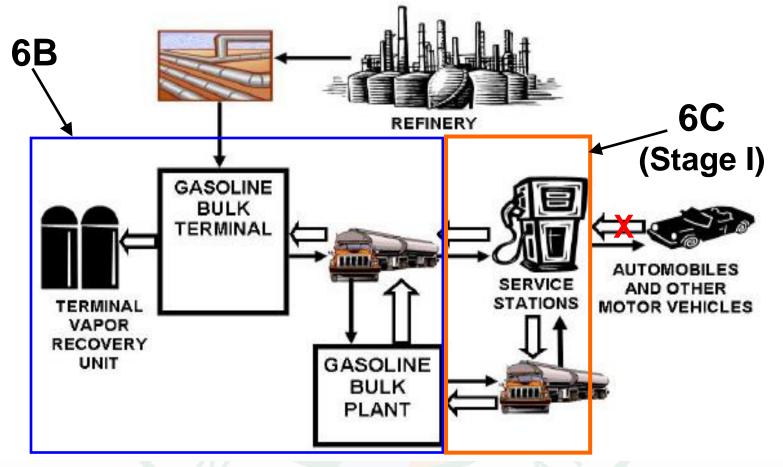
- Gasoline Distribution Bulk Terminals,
- Bulk Plants, and
- Pipeline Facilities

40 CFR 63 Subpart CCCCCC (6C)

Gasoline Dispensing Facilities (GDFs)

Final Rule – January 10, 2008, and Proposed Rule (Amendments) – December 15, 2009

Flow Diagram of Gasoline Distribution System



Solid arrows indicate flow of gasoline, open arrows indicate flow of gasoline vapors.

6B Rule - General Requirements:

- 1. Best seals on most storage tanks at terminals and pipeline facilities;
- 2. Use of submerged fill pipes when loading storage tanks at bulk plants;
- 3. Vapor processors to control cargo tank (railcars and tank trucks) loadings at most bulk terminals;
- 4. Use of submerged fill pipes to control tank truck loading emissions at bulk plants and small bulk terminals;
- 5. Leak testing of tank trucks and railcars; and
- 6. Checking for equipment leaks (sight, sound, and smell inspections) and using good housekeeping procedures to prevent evaporation of gasoline.

Size does matter for these Regulations!

Like many other USEPA rules, requirements vary due to the size and type of equipment.

For example, large tanks or large cargo racks with large gasoline throughputs require more stringent air emissions control.

Smaller tanks and equipment with smaller throughputs, and fewer emissions, require less stringent controls.

Size does matter for these regulations!

For Example: Storage Tanks at Bulk Gasoline Terminals and Pipeline Facilities

With a size at or above 20,000 gallons, use specified floating roofs and seals or a closed vent system and control device to reduce air emissions by 95%.

With a size below 20,000 gallons, cover the tank with a fixed roof and maintain all openings in a closed position when not in use.

Cargo Tank Loading Racks

For a gasoline flow at or above 250,000 gallons per day:

- Reduce TOC emissions to .00067 pounds per gallon of gasoline loaded into cargo tanks (80 milligrams per liter loaded) and
- Only load gas into cargo tanks that are demonstrated to be vapor tight.

For a gasoline throughput less than 250,000 gallons per day:

 Use submerged filling (drop tubes) for the loading of cargo tanks.

6B - Vapor processors to control tank truck loadings at most bulk terminals







Other General 6B Requirements

Equipment Leaks:

For all facilities—monthly check for leaks by smelling, listening to, and looking at all pieces of equipment in gasoline liquid or vapor service.

Other:

Control devices used on loading racks at bulk terminals must be tested to show that they meet the emission limit and the operation of the control device must be continuously monitored.

Closed vent systems and control devices used on storage tanks also must be tested to show that they meet the emission limit.

You can also use a recent performance test or provide documentation that the devices meet another operating permit.

Other General 6B Requirements

Perform annual inspections of storage tank roofs and seals for bulk terminals and pipeline breakout stations.

Storage tank and loading rack control devices must be continuously monitored for proper operation and compliance with the emission limit.

6B Reporting, Records and Compliance

- 1. Initial Notification was due by January 10, 2008 for New Sources, and May 9, 2008, for Existing Sources.
- 2. Notification of Compliance Status for all facilities is due January 10, 2011. *Notification of Compliance Status may be submitted in lieu of Initial Notification*.
- 3. Owner/Operators must submit a Notification of Performance Test prior to initial test on vapor processing and collection systems.
- 4. Semi-annual compliance reports and excess emissions reports (if applicable), are required.

6B Reporting, Records and Compliance

If you are already meeting the rule requirements, you can turn in the Notification of Compliance Status form instead of the Initial Notification.

If you are not yet meeting these requirements, you must turn in an Initial Notification form and a Notification of Compliance Status.

Each owner or operator of a bulk gasoline terminal that is NOT yet meeting these requirements must submit a Notification of Performance Test form before doing your first test on vapor processing and collection systems.

You must turn in compliance reports two times a year and also turn in excess emissions reports if you have a "high emissions" event.

Initial Notification and Notice of Compliance Status-6B (one form)

Initial Notification/Notification of Compliance Status Report for Bulk Gasoline Plants



<u>Applicable Rule:</u> 40 CFR Part 63, Subpart BBBBBB — National Emission Standards for Hazardous Air Pollutants for Area Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, and 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Initial notification is being made in accordance with section 63.9(b).

Note: Initial notification reports for existing sources are due not later than May 9, 2008, or within 120 calendar days after the source becomes subject to the relevant standard. Sources may also use the application for approval of construction or reconstruction under section 63.5(d) to fulfill the initial notification requirement. If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) - the Application for Approval of Construction or Reconstruction. You may use the Application for Approval of Construction and Reconstruction as your initial notification. (section 63.5(d)(1)(ii)).

(section 63.5(d)(1)(ii)).	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
	Initial Notification (Notification/Notification of Compliance Status offication only and am now in compliance)
Print or type the following information of type the following information of the print of the pr		y for which you Facility I.D. Nu	are making notification: (section 63.9(b)(2)(i)-(ii)) mber (optional)
Responsible Official's Name/Title			
Street Address			
City	State		Zip code
Facility Name (if different from Responsible Official's Name)			
Facility Street Address (If different than Responsible Official's Street Address)			

Subpart CCCCC (6C) Gasoline Dispensing Facilities (GDFs)

For existing and new facilities:

Existing facility before November 9, 2006

New facility if after this date.

6C-Stage I GDFs

The rule requirements are different for GDFs that have less than a 10,000 gallon/month throughput, a 10,000 to 100,000 gallon/month throughput, and a greater than 100,000 gallon/month throughput.

- January 2008, EPA passed a federal rule for Gas Stations that requires **Stage I** Vapor Recovery for all stations that have a monthly throughput of 100,000 gallons or more.
- Existing sources have until **January 2011** to comply with this new federal rule.
- State or Local Option: Enhanced Stage I regulations could require vapor recovery for stations at a lower throughput than is currently required by the federal government.

6C Gasoline Dispensing Facilities (GDFs)

This rule applies to gasoline dispensing facilities (GDF) that are area sources of HAP. A GDF is defined as any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle.

The affected source subject to this rule includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

6C - Retail and Private GDFs Nationwide:

- At all facilities, checking for leaks and using good housekeeping procedures to prevent evaporation of gasoline, and
- At facilities with monthly gasoline throughputs of 10,000 gallons/month or more, submerged fill pipes when loading storage tanks, and
- At facilities with monthly gasoline throughputs of 100,000 gallons/month or more, vapor balancing (Stage 1) between the storage tank and the tank truck.

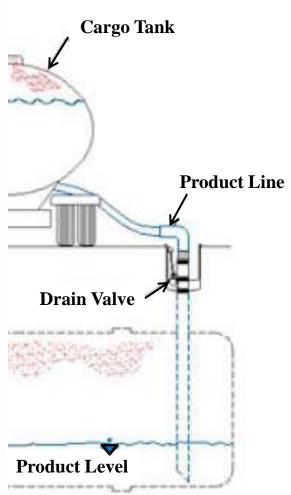
6C - GDFs

All facilities must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time.

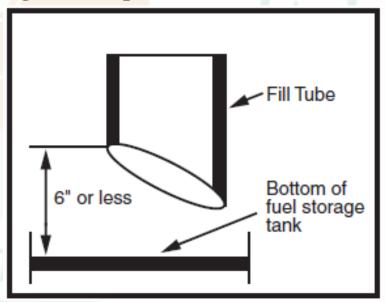
Measures to be taken include, but are not limited to, the following:

- 1. Minimize gasoline spills;
- 2. Clean up spills as expeditiously as practicable;
- 3. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
- 4. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

Fill Pipes



- Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the storage tank.
- Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the storage tank.
- Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements.



6C Equipment Requirements (vary by monthly throughput)

Facilities with a monthly flow of *under* 10,000 gallons/month must:

- Minimize spills, and if there is a spill, clean it up as quickly as possible.
- Cover gasoline containers & storage tank fill pipes with gasketed seals.
- Minimize gasoline sent to open collection systems.

Facilities with a monthly flow *at or above* 10,000 gallons/month must meet all of the requirements above and also:

Load all storage tanks at or above 250 gallons capacity using submerged fill (drop tubes.)

6C Equipment Requirements

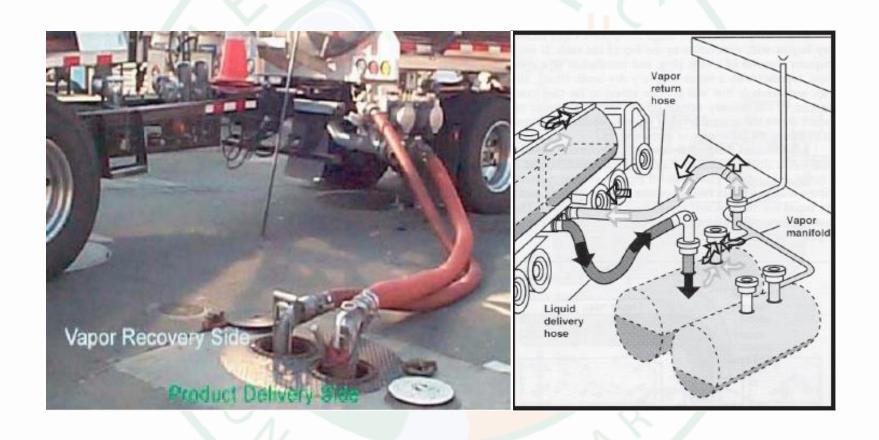
Facilities with a monthly flow *at or above* **100,000 gallons/month** must meet all of the previous requirements and either:

Operate a vapor balance system that meets a specified enforceable State, local, or tribal rule or permit

-or-

Operate **vapor balance system** during storage tank loadings, test the system periodically to make sure it works correctly, and includes specific equipment and work practices, or meets 95% control.

Dual Point Vapor Recovery



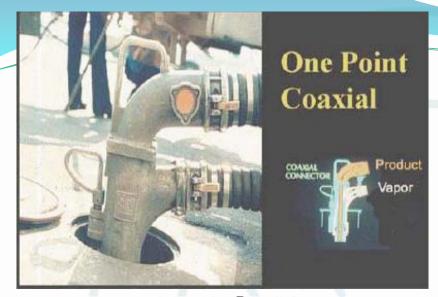


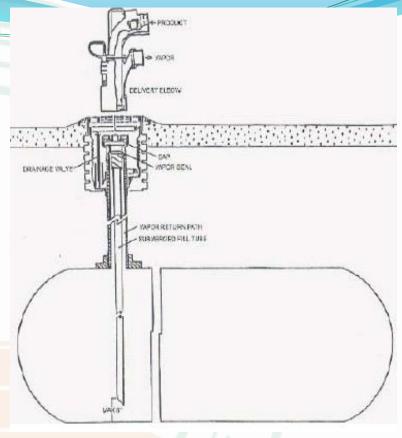


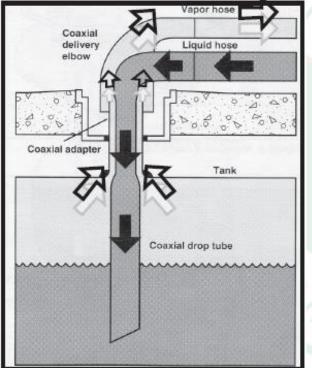
Dry Break



These practices are in violation of the regulation!







Please note: coaxial vapor recovery systems will only be allowed as a retrofit to tanks installed prior to 11/9/06. Coaxial controls may not remain vapor and liquid tight over extended periods of use due to repeated torque force on the swivel adaptor. EPA strongly discourages the use of coaxial systems because of these problems.

Pressure Vacuum Vents





Vents must be installed and tested to make sure they have the proper "cracking pressure".

Pressure Vacuum Vents – Installation Violations





100,000 gallon/month throughput Gasoline Cargo Tank Requirements

- 1. All hoses in the vapor balance system are properly connected,
- 2. The adapters or couplers that attach to the vapor line on the storage tank have closures that seal upon disconnect,
- 3. All vapor return hoses, couplers and adapters used in the gasoline delivery are vapor-tight,
- 4. All tank truck vapor return equipment is compatible in size and forms a vapor tight connection with the vapor balance equipment on the GDF storage tank,
- 5. All hatches on the tank truck are closed and securely fastened.
- 6. The filling of storage tanks at GDF shall be limited to unloading by vapor-tight gasoline cargo tanks. Documentation that the cargo tank has met the specification of EPA Method 27 shall be carried on the cargo tank.

6B and 6C Compliance Dates

- GDF is "new" if construction, reconstruction of affected source began after November 9, 2006
- New sources must achieve compliance by January 10, 2008, or upon initial startup of the affected source, whichever is later
- Existing sources must achieve compliance by January 10, 2011

6C Notification, Reporting and Records

Less than 10,000 gallons/month:

None, but must demonstrate throughput is less than 10,000 gallons/month.

Greater than 10,000 gallons/month:

- Initial notification for existing GDFs: 5/9/08
- New GDFs: 15 days

Greater than 100,000 gallons/month:

- Same as for greater than 10K gallons/month, plus:
- System records, reports, tests
- Record of initial and every three year pressure tests
- Test notification 60 days prior to test and results 180 days after test

6C Notification, Reporting and Records

Notification of Compliance Status for GDFs:

If new or reconstructed after November 9, 2006, no later than January 10, 2008

If new and started after January 10, 2008, upon startup

If existing, no later than January 10, 2011

If average monthly throughput increases and becomes subject to additional requirements, then no later than 3 years after the GDF becomes subject to the rule.

Where to Send Notifications and Reports

Notifications and reports are to be sent to:

NMED AQB in Santa Fe

And to

EPA Region 6
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202-2733

For More Information

http://www.epa.gov/ttn/atw/area/arearules.html

- Brochures
- One-page summaries
- Flow charts
- Example Notification forms

Ask SBEAP, we may have information that we can give to you (check our website):

http://www.nmenv.state.nm.us/aqb/sbap/

And go to our Industry Sector Page

Thank you for listening!

If you need further information, we can help you.

Steve Dubyk (505)222.9507

Or email me at:

steve.dubyk@state.nm.us